

EPA Final Comments

General Comments

1. During the teleconference held on May 27, 2021, a review of the fish collected activities for radiological analysis resulted in changes to the analytical processing for some limited-in-number smaller-sized fish or singular fish which did not contain sufficient body mass for filet/carcaass processing. It was agreed that these fish would be analyzed as “whole fish” consistent with the fish collected in the upper reaches of Bear Creek (i.e., BCK 9.9 and BCK 12.4) and they will not be included in the statistical analysis but rather indicate “Baseline” conditions. Please add this information to the SAP in the appropriate section(s) of the document.

Specific Comments

1. Page 2. The text states:

The purpose of this SAP is two-fold: (1) collect additional fish population data to determine the most appropriate location(s) to evaluate risk to fishermen who are consuming fish, and (2) collect fish tissue data that will be used to define the human health risk from fish consumption from these sites and will be considered in determining the appropriate discharge limits for radionuclides from the EMWMF and proposed EMDF.

Comment: Revise to state that this SAP has three objectives and include “(3) to assess possible radiological contaminated fish along Bear Creek where security restrictions prevent a fisher access to the creek.”

2. Page 18, DQO Step 1 - Overarching Problem Statement. The text states:

This SAP was developed establish baseline conditions of radionuclides in fish in Bear Creek and to support...

Comment: Please add the word “to” between developed and establish.

3. Page 19, DQO Step 3. Identify Inputs to the Decisions, Table 5. DQO decision inputs. The acronym “CY” has been added to the table. It is not listed in the acronyms. Please add.

4. Page 20, D1.4, Existing Inputs column. The text states:

Existing frozen fish data from BCK 3.3 and Hinds Ck was used as a reference to inform the DQO and SAP.

Comment: Please spell out “Creek.” Otherwise add acronym.

(End of Comments)